

Internal Background on Tetra Tech EC Inc. Sampling Incident at Navy's Hunter's Point Site 5/31/2018

Hunter's Point Site Information:

- The 934-acre Hunters Point Naval Shipyard (HPNS) is one of the largest and most complex Navy Superfund cleanups nationwide. Cleanup is expected to cost more than \$1 billion.
- The Navy is the lead agency responsible for the investigation and cleanup of HPNS. EPA and its state regulatory agency partners conduct oversight under CERCLA.
- San Francisco is redeveloping the site and nearby Candlestick Park. It plans to eventually create over 10,000 homes, 10,000 jobs, R&D space, and parks. Additional redevelopment information can be found here: [[HYPERLINK "http://sfocii.org/hunters-point-shipyard-and-candlestick-point"](http://sfocii.org/hunters-point-shipyard-and-candlestick-point)]

Data Fraud Incident:

- Over the past few years, there have been allegations and investigations into sampling data manipulation and fraud by the Navy's contractor, Tetra Tech EC Inc, working on a fixed price contract, at the Hunter's Point site. Tetra Tech EC Inc. is a subsidiary of Tetra Tech Inc., its parent company.
- In 2017, two employees of Tetra Tech EC Inc. pled guilty to falsifying records in a federal investigation, substituting clean dirt for legitimate soil samples to falsify the results of radiological remediation efforts. The employees were recently sentenced to eight months in jail.
- Most site remedies at the HPNS are underway or complete. Cleanup operations are ongoing and steps have been taken to ensure that redevelopment plans may continue safely.
- The Navy has already transferred four Parcels to San Francisco for redevelopment. New residents have already moved into hundreds of condos. Transfers of most of the remaining nine parcels are planned to occur over the next five years. Transfers are currently on hold until the Tetra Tech issues are resolved.
- Additional redevelopment plans have been delayed at least a year due to falsification of radiation data by Navy contractor Tetra Tech EC Inc.
- Congressional interest from Representative Pelosi and Senators Harris and Feinstein.
- Local leaders and citizens have expressed concerns about exposure to residents and delay of redevelopment. Reporters and local activists have questioned site cleanup standards and health threats to residents and workers.
- Questions are being raised about Tetra Tech EC Inc.'s radiological work at other sites nationwide, e.g. Navajo Nation, Los Alamos.

Action Resulting from Incident:

- The Navy's draft data evaluation reports, which are public, show signs of widespread falsification at the HPNS site.
- The Navy therefore under EPA and State oversight, plans in 2018 to begin resampling and, if necessary, conduct additional cleanup. Specific timing has not been set.
- EPA and the State have been reviewing radiological data collected by a variety of contractors from air monitors (both upwind and downwind), groundwater samples, and fence line scans. The San Francisco Department of Public Health has also independently evaluated the situation. EPA has met with ATSDR, who provided contact information for the public about the local Occupational and Environmental Clinic.
- As of May 3, 2018, neither Tetra Tech EC Inc., nor its parent company, Tetra Tech Inc., has been debarred or suspended from winning federal government contracts.

Agency Follow-up Activity:

- EPA HQ and Region 9 are working together and coordinating with DoD (USACE, USN), DOE and NASA to spot issues from the impact of the incident that occurred with the Navy's contractor at Hunter's Point site such as:
 - Potential extent of data manipulation;

- Number of response sites (remedial and removal) where Tetra Tech EC Inc. was a contractor to EPA;
- Number of sites Tetra Tech EC Inc. may have been a subcontractor; and
- Corporate structure between Tetra Tech EC and Tetra Tech to determine if the allegations are limited to work performed by Tetra Tech EC. (Tetra Tech is widely used by EPA as a contractor on many sites.)